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ODJFS

FEDERAL CREDIT UNION

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March 23, 2009

Ms. Mary Rupp
Secretary of the Board
National Credit Union Administration
1775 Duke St
Alexandria, VA 22314-3428

Re: Advanced Notice or Proposed Rulemaking to 12 CFR Part 704

Dear Ms. Rupp:

I would like to take this opportunity to comment on the Advance Notice of Proposed Rulemaking (ANPR) to 12 CFR Part 704 on behalf of ODJFS Federal Credit Union's Board of Directors & management.

ODJFS Federal Credit Union is \$9 million in assets and has 2875 members who are primarily state employees. This credit union is dependent on Corporate One FCU for the following services:

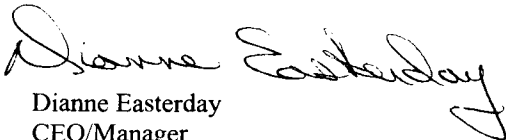
- Share draft processing with check imaging
- Settlement services
- Alliance One ATM Network
- ACH origination
- Liquidity needs
- ACH receipt
- Check 21 (ACE) with achieving
- Wires including international
- Line of Credit
- ATM transaction processing
- Investments
- Federal Reserve return deposit item settlement
- Partner relationship for cash deposits (ADDS)
- Excellent member service

Corporate One Credit Union's existence is mandatory to this Credit Union's operation. We would cease to exist without the expertise & support of their staff. The service options available to small credit unions are minimal, especially monetarily.

We will not belabor our plea any further. We merely ask for consideration & equity when formulating the final plan for Corporate System restructuring. Decisions that are enacted at this point will most certainly mold the future of the entire Credit Union movement.

We appreciate the opportunity to comment and hope that our correspondence has illustrated the importance of the corporate system's role in our daily operations.

Sincerely


Dianne Easterday
CEO/Manager

CC: Chairman Fryzel
Vice Chairman Hood
Board Member Hyland